



National Iranian American Council | Community. Democracy. Universal Rights.

January 8, 2012

William A. Cooper
Chairman and Chief Executive Officer
TCF Financial Corporation
200 Lake Street East
Wayzata, MN 55391-1693

Dear Mr. Cooper,

I am writing on behalf of the National Iranian American Council, the largest grassroots organization representing Americans of Iranian descent, regarding TCF Bank's intention to close bank accounts for Iranian students studying in the United States. We have serious concerns that such action constitutes discrimination on the basis of national origin. We strongly urge for TCF Bank to reverse this action and to ensure its policies do not discriminate against Iranians in the U.S.

We have received several reports that TCF Bank notified at least twenty-one Iranian students at the University of Minnesota on December 26, 2012, that their university-linked bank accounts will be unilaterally closed on January 29, 2013. The notifications contained no explanation for the planned closure, nor did they provide any mechanism for appeal.

All of the students who received these notices from TCF Bank are Iranian. The affected students were not previously contacted by TCF Bank regarding problematic transactions. Furthermore, the affected students maintain they were not engaging in any questionable transactions and some of them were not even engaging in international transactions. In at least one case, an affected student's account had been inactive for over a year. We have also received reports that Iranian students in other cities have received similar notices from TCF Bank.

Based on this information, the only apparent pattern for TCF Bank's decision to close these accounts is that the account holders are Iranian. If this is indeed the case, it would constitute discrimination on the basis of national origin. While there are significant financial sanctions against Iran, there is no applicable statute to justify closing the bank accounts of Iranian students based on nationality. There are, however, anti-discrimination laws and constitutional protections in place to prevent discrimination on the basis of national origin against persons under U.S. jurisdiction.

We respectfully request an explanation for TCF Bank's actions and strongly urge that immediate steps be taken to reverse the intended closures of these accounts and to ensure there is no policy in place to discriminate against Iranians.

Board of Directors

Trita Parsi, PhD, President
Award-winning author

Reza Firouzbakht, Chairman
Senior Manager, Accenture

Prof. Ali Fatemi, Treasurer
DePaul University

Lyric Hughes Hale
Founder, China Online

Hossein Hosseini, PhD
Director, Avery Dennison

Gita Kashani
CPA

Michael Kazemi, Esq
Kazemi & Associates

Paymaun Lotfi, MD
Orthopedic Surgeon

Genevieve Lynch
President, Kenbe Foundation

Shokooh Miry, PhD
Psychologist

Azita Mojared, Esq
Mojared & Associates

Prof. Karim Pakravan
DePaul University

Forough Parvizian-Yazdani, DDS
Dentist

Lily Sarafan
COO, Home Care Assistance

Nora M. Valenzuela
PMO, Riverside County

Board of Advisors

The Honorable Wayne Gilchrest
Former Member of Congress

The Honorable Jim Moody
Former Member of Congress

The Honorable Thomas Pickering
Former Under Secretary of State

The Honorable John Limbert
Former Deputy Assistant Secretary of State

Reza Aslan, Author

Prof. Mehrzad Boroujerdi
Syracuse University

Prof. Juan Cole
University of Michigan

Prof. Farideh Farhi
University of Hawai'i

Maz Jobrani, Actor

Prof. Ahmad Karimi-Hakkak
University of Maryland

Habib Ladjevardi, PhD
Harvard University

Cyrus Mehri
Mehri & Skalet, PLLC

Alex Patito
NIAC Co-Founder

Prof. R.K. Ramazani
University of Virginia

Prof. Ahmad Sadri
Lake Forest College

We look forward to your response.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jamal Abdi'.

Jamal Abdi, Policy Director
National Iranian American Council